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November 3, 2023

**Via ECF and E-Mail**

Hon. Andrew L. Carter  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Barend Oberholzer*, 1:21-cr-00475-ALC**

Dear Judge Carter:

I am writing on behalf of defendant Barend Oberholzer to respectfully request that the Court extend Mr. Oberholzer's travel restrictions to permit travel to the state of Tennessee where Mr. Oberholzer frequently travels for his business. Over the next months, Mr. Oberholzer anticipates several trips to Tennessee, including one this Sunday. As opposed to burdening the Court with frequent bail modification applications, we instead ask that the Court include Tennessee in the areas Mr. Oberholzer is permitted to travel. Pretrial Services, by PTSO Dominique Jackson, and the government, by AUSA Timothy Capozzi, take no position on Mr. Oberholzer's application.

By way of background, on March 2, 2021, Judge Lehrburger released Mr. Oberholzer on a \$500,000 personal recognizance bond secured by two financially responsible persons, with conditions including, *inter alia*, that Mr. Oberholzer's travel be limited to the Southern and Eastern Districts of New York, and the Central and Southern Districts of California. Since that date, Mr. Oberholzer has remained compliant with the conditions of his release. With the Court's permission, Mr. Oberholzer has previously traveled for business, including to Tennessee, and for family vacations without incident.

We thank the Court for its consideration in this matter.

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Respectfully submitted,

/s/ Ryan P. Poscablo

Ryan P. Poscablo, Esq.

cc: Jilan Kamal, Esq., Assistant United States Attorney (by ECF)  
Dominique Jackson, Pretrial Services (by email)

So Ordered:

A handwritten signature in black ink, appearing to read "Andrew L. Carter, Jr.", written over a horizontal line.

Hon. Andrew L. Carter, Jr. 11/3/23